

BAKER BOTTS LLP

ONE SHELL PLAZA
910 LOUISIANA
HOUSTON, TEXAS
77002-4995

TEL +1 713.229.1234
FAX +1 713.229.1522
BakerBotts.com

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May 8, 2013

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BY ELECTRONIC MAIL

Kathleen E. Weir
TEL +1 713.229.2108
FAX +1 713.229.7908
kathleen.weir@bakerbotts.com

Mr. Edwin Quinones
Assistant Regional Counsel (6RC-S)
United States Environmental Protection Agency
Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733
quinones.edwin@epa.gov

Re: U.S. Oil Recovery Superfund Site

Dear Edwin:

I write on behalf of ESCO Marine, Inc., ("ESCO Marine") in response to EPA's letter dated March 14, 2013, providing notice that ESCO Marine may be a potentially responsible party at the U.S. Oil Recovery Superfund Site ("the Site") under Section 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"). That letter also provided notice under CERCLA Section 122(e) that EPA wished to enter into formal negotiations regarding the Site.

ESCO Marine acknowledges that it was involved in arranging the disposal of waste to the Site and wants to negotiate in good faith with EPA.

ESCO Marine's understanding is that the current total volume of waste estimated for the site is 200,000,000 gallons. While a review of its records is on-going, ESCO Marine understands that its contribution to the Site is less than 1 percent of the total waste at the Site. As such, ESCO Marine believes that its involvement at the Site was *de minimis*.

ESCO Marine is willing to contribute to clean up of the Site at a level that is commensurate with its involvement. ESCO Marine would like to be involved with EPA—and other similarly situated *de minimis* potentially responsible parties—in negotiating a *de minimis* settlement for the Site.

You may contact me with regard to future discussions of ESCO Marine's involvement with the Site as indicated above.

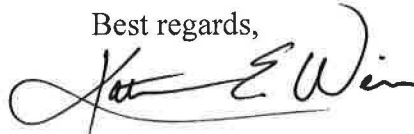
BAKER BOTTS LLP

Mr. Edwin Quinones

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May 8, 2013

Best regards,

A handwritten signature in black ink, appearing to read 'Kathleen E. Weir', written over a horizontal line.

Kathleen E. Weir

cc: Richard Jaross
C.J. Mire